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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
DEBTORS¹	§	Jointly Administered
	§	

**DEBTORS' RESPONSE TO AMENDED DESIGNATIONS BY THE ATTORNEY
GENERAL OF THE STATE OF NEW YORK'S DEPOSITION DESIGNATIONS AND
COUNTER-DESIGNATIONS THERETO**

The National Rifle Association of America (“NRA”) and Sea Girt LLC (“Sea Girt” and together with NRA, the “**Debtors**”), debtors and debtors-in-possession, by and through their counsel, submit the following Amended Objections and Counter-Designations to the Attorney General of the State of New York’s (“NYAG”) Designations of Depositions & Prior Testimony.

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt).

GENERAL OBJECTIONS

The Debtors reserve their right to raise objections to testimony as it is read into the record or played live at the hearing in this matter, and incorporates those objections made at the time of testimony as noted in the deposition transcripts.

Furthermore, the designations included testimony that may be cited as confidential and therefore, upon the Court's ruling on objections and testimony being submitted for the record, certain information may need to be sealed as appropriate.

Finally, the designating party has not indicated an intent to introduce any exhibits through these designations and Debtors reserves their rights to object if, and when, the designating party moves for the admission of any exhibits into evidence.

Debtors reserve the right to amend or supplement these objections and counter-designations.

SPECIFIC OBJECTIONS

Deposition of Wilson Phillips, Jr, taken on March 19, 2021.

Wilson Phillips	NYAG Designations²	Debtors' Designations/Counter-Designations
1.	15: 11-14	15:11-12
2.	16:21-17:9, 18:2-10	18:11-12; 20-24
3.		22:9-13
4.	46:1-47:1	
5.	52:17-55:5	
6.	55:19-58:6	
7.	63:6-64:10	64:11-16
8.	81:10-88:18	

² The Court heard and ruled on the Debtors' Objections to the NYAG's Designations during the hearing on April 16, 2021. As a result, the Debtors have not restated them here but incorporate them by reference. Nothing herein shall be deemed a waiver thereof.

Wilson Phillips	NYAG Designations²	Debtors' Designations/Counter-Designations
9.	89:10-90:3	
10.	121:21-122:21	
11.	124:12-125:17	
12.	126:9-127.3	
13.	134:4-140:9	
14.	141:14-147:13	
15.	148:23-149:6	
16.	152:12-153:11	153:22-154:2
17.		166:14-168:4
18.		169:10-24
19.		170:16-171:4
20.		171:25 - 172:6
21.	179:3-181:19	
22.	182:5-17	
23.	186:9-187:9	
24.		193:17-19
25.		194:1-6; 11
26.	221:7-222:19	
27.		223:1-5
28.	228:6-17	
29.	237:10-15	

Wilson Phillips	NYAG Designations²	Debtors' Designations/Counter-Designations
30.		248:9-250:25
31.		281:15-23
32.		284:23 - 285:17
33.		285:24 - 286:16

Deposition of Gayle Stanford, taken March 25, 2021.

Gayle Stanford	NYAG Designations	Debtors' Objections	NYAG's Responses	Debtor's Designations³
1.				13:2-8
2.				13:25-14:8
3.				14:21-24
4.				16:10-12
5.				16:21-17:8
6.				18:3-23
7.				19:5-20
8.				20:18-22:6
9.				22:1-6
10.				23:7-14
11.				23:22 – 24:4
12.				24:14-23

³ The Debtors' designations were also previously provided as ECF No.476, but have been revised to address the revisions made by the NYAG.

Gayle Stanford	NYAG Designations	Debtors' Objections	NYAG's Responses	Debtor's Designations³
13.	31:11-32:05			
14.	33:20-34:02			
15.				36:1-18
16.				39:9-13
17.	41:10-41:19			
18.	41:20-41:25			
19.	42:02-42:12			
20.	42:13-42:14			
21.	42:15-42:22			
22.	42:25-43:4			
23.	45:23-46:01			
24.	46:02-46:02			
25.	46:06-46:15	Objection. Foundation		
26.	47:20-48:01			
27.	48:02-48:15			
28.				54:10-16
29.				75:21-76:8
30.				76:9-78:9
31.				84:13-85:5
32.				86:8-13

Gayle Stanford	NYAG Designations	Debtors' Objections	NYAG's Responses	Debtor's Designations³
33.	122:01-122:16	Speculation (122:13-18)	<u>Responses to Debtors' objections:</u> Speculation objection to 122:01-122:16 is meritless. The question asks Ms. Stanford whether, in the normal course, her invoices sent to Ackerman McQueen would be paid by Ackerman McQueen.	
34.	122:17-122:18	Outside scope of direct	Speculation (122:13-18)	
35.	123:08-124:05	Outside scope of direct		
36.				124:13-21

Dated: April 19, 2021

Respectfully submitted,

/s/ Gregory E. Garman

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